

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

**UNITED STATES OF AMERICA**

**v.**

**JOHN WESLEY NEWELL  
Defendant.**

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)  
)  
)  
)  
)

**No. 3:12-00040  
Chief Judge Haynes**

*OKED*  
*Thurston*  
*11/08/12*  
*Will*  
*8-2614*

**MOTION FOR ORDER DIRECTING WARREN COUNY DETENTION CENTER  
TO COLLECT MEDICAL SAMPLES FROM DEFENDANT FOR TRANSMITTAL FOR  
LABORATORY TESTING AND**

**TRANSMISSION OF SUCH TEST RESULTS TO THE  
TRI-STAR CENTENNIAL TRANSPLANT CENTER**

Comes now the Defendant, John Wesley Newell, by and through counsel, and respectfully requests that the Court enter an Order directing Jackie T. Strode, Jailer of the Warren County Detention Center where the Defendant is presently housed, to arrange for the collection of the samples needed for the tests listed below and to transmit such samples to a reputable laboratory to conduct such tests:

ABO test

24 hour urine for protein and creatinine clearance test.

Test results should be forwarded to the TriStar Centennial Transplant Center, Organ Transplant Department, c/o Mr. Sean Daniel, Clinical Manager, 2400 Patterson Street, Suite 115, Nashville, Tennessee 37203.

For cause, the Defendant would show the Court that these tests are required in preparation for the Defendant's donation of his kidney to his Mother for transplant. (Doc. 112). Defendant's counsel has verified the procedures with the Transplant Center and has attached the letter explaining said procedures. (Attached).

WHEREFORE, the Defendant respectfully requests that the Court enter an Order directing Jackie T. Strode, Jailer of the Warren County Detention Center where the Defendant is presently housed, to arrange for the collection of the samples needed for the following tests:

ABO test,

24 hour urine for protein and creatinine clearance; and

to send the samples to a reputable laboratory with the results to be sent to the TriStar Centennial Transplant Center, Organ Transplant Department, c/o Mr. Sean Daniel, Clinical manager, 2400 Patterson Street, Suite 115, Nashville, Tennessee 37203. The costs of such testing is to be borne by the Defendant's family.

Respectfully submitted,

s/Thomas F. Bloom

Thomas F. Bloom  
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**CERTIFICATE OF SERVICE**\_\_\_\_\_

I hereby certify that I have provided a true and exact copy of the foregoing to all interested parties via the ECF system on this 25<sup>th</sup> day of September, 2014.

s/ Thomas F. Bloom